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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 RENO MAY, an individual;  
15 ANTHONY MIRANDA, an individual;  
16 ERIC HANS, an individual; GARY  
BRENNAN, an individual; OSCAR A.  
BARRETTO, JR., an individual;  
17 ISABELLE R. BARRETTO, an  
individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
20 AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

21 Plaintiffs,  
22 v.

23 ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

24 Defendants.

25 Case No.: 8:23-cv-01696 CJC (ADSx)

26 **DECLARATION OF SAM PAREDES  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

27 **42 U.S.C. §§ 1983 & 1988**

28 Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

## **DECLARATION OF SAM PAREDES**

2       1. I, Sam Paredes, am the Executive Director of Gun Owners of California, Inc.  
3 (“GOC”), a plaintiff in the above-entitled action. I make this declaration of my own  
4 personal knowledge and, if called as a witness, I could and would testify  
5 competently to the truth of the matters set forth herein.

6       2. GOC is recognized as a 501(c)(4) non-profit mutual benefit corporation  
7 under the Internal Revenue Code and a recognized non-profit membership  
8 corporation under the state of California. GOC is incorporated in the state of  
9 California and is currently headquartered in El Dorado Hills, California.

10       3. GOC is dedicated to the preservation and restoration of the Second  
11 Amendment in California. It was formed for the express purpose of promoting,  
12 encouraging, and advocating for the purchase, use, and ownership of firearms and  
13 related products. GOC opposes legislation that it deems harmful to the right to keep  
14 and bear arms, while fighting to protect the Second Amendment rights of all  
15 Californians at the capitol, in the courts, and through elections. GOC strongly  
16 believes that the rights enshrined in the Second Amendment guarantees those  
17 enshrined by the First Amendment.

18       4. Many GOC members in California have valid and current concealed carry  
19 weapon (“CCW”) permits, which enables them to lawfully carry a concealed  
20 firearm in public, so that they can defend themselves (and potentially others) with  
21 lethal force in the event of a life-threatening emergency situation.

22       5. Because SB 2 would prohibit GOC's members in California from carrying in  
23 many places where they often carry and are accustomed to concealed carrying a  
24 firearm, the utility of their CCWs, and thus their right to be armed for self-defense  
25 in public, will be severely curtailed and outright eliminated in many common  
26 locations.

27       6. For example, under SB 2 they cannot carry where alcohol for consumption  
28      on the premises is served. That means they cannot conceal carry at restaurants they

1 patronize on a regular basis, nor carry in the parking area outside such an  
2 establishment.

3      7. SB 2 also prohibits GOC members in California from concealed carrying in  
4 parks and public lands they often frequent. And under SB 2, carry is prohibited at  
5 urgent care facilities which GOC members have used in the past for rapid medical  
6 attention and would use in the future. Under SB 2, carry is prohibited at financial  
7 institutions such as banks that GOC members frequent.

8        8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
9 privately owned commercial establishment that does not affirmatively display  
10 notice that the establishment tolerates concealed carry at the establishment's  
11 premises. There are many local businesses that GOC members frequent that will  
12 likely not post such signs, forcing them to either not carry there or stop patronizing  
13 them.

14        9. These are just a few examples of how SB 2 harms our members. Suffice it to  
15 say, GOC believes that SB 2 is abhorrent and incompatible with the general right of  
16 Americans, including Californians who are GOC members, to carry a firearm in  
17 public for self-defense.

19 I declare under penalty of perjury that the foregoing is true and correct.  
20 Executed within in the United States on September 29, 2023.

Sam Paredes, declarant

**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

**IT IS HEREBY CERTIFIED THAT:**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF SAM PAREDES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

*Laura Palmerin*